

# **EXHIBIT A**

MCKESSON'S DEPOSITION DESIGNATIONS FOR DONALD WALKER					
DEPO DATE	DESIGNATION TYPE	Begin Page at	Begin Line at	End Page at	End Line at
1/10/2019	McKesson Affirm	357	10	357	25
1/10/2019	McKesson Affirm	358	1	358	25
1/10/2019	McKesson Affirm	359	1	359	25
1/10/2019	McKesson Affirm	360	1	360	25
1/10/2019	McKesson Affirm	361	1	361	25
1/10/2019	McKesson Affirm	362	1	362	25
1/10/2019	McKesson Affirm	363	1	363	25
1/10/2019	McKesson Affirm	364	1	364	25
1/10/2019	McKesson Affirm	365	1	365	25
1/10/2019	McKesson Affirm	366	1	366	25
1/10/2019	McKesson Affirm	367	1	367	25
1/10/2019	McKesson Affirm	368	1	368	25
1/10/2019	McKesson Affirm	369	1	369	25
1/10/2019	McKesson Affirm	370	1	370	3
1/10/2019	McKesson Affirm	370	5	370	25
1/10/2019	McKesson Affirm	371	1	371	25
1/10/2019	McKesson Affirm	372	1	372	25
1/10/2019	McKesson Affirm	373	1	373	25
1/10/2019	McKesson Affirm	374	1	374	25
1/10/2019	McKesson Affirm	375	1	375	25
1/10/2019	McKesson Affirm	376	1	376	25
1/10/2019	McKesson Affirm	377	1	377	25
1/10/2019	McKesson Affirm	378	1	378	25
1/10/2019	McKesson Affirm	379	1	379	25
1/10/2019	McKesson Affirm	380	1	380	25
1/10/2019	McKesson Affirm	381	1	381	25
1/10/2019	McKesson Affirm	382	1	382	25
1/10/2019	McKesson Affirm	383	1	383	25

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1/10/2019	McKesson Affirm	384	1	384	25
1/10/2019	McKesson Affirm	385	1	385	25
1/10/2019	McKesson Affirm	386	1	386	25
1/10/2019	McKesson Affirm	387	1	387	25
1/10/2019	McKesson Affirm	388	1	388	25
1/10/2019	McKesson Affirm	389	1	389	25
1/10/2019	McKesson Affirm	390	1	390	25
1/10/2019	McKesson Affirm	391	1	391	25
1/10/2019	McKesson Affirm	392	1	392	25
1/10/2019	McKesson Affirm	393	1	393	25
1/10/2019	McKesson Affirm	394	1	394	25
1/10/2019	McKesson Affirm	395	1	395	25
1/10/2019	McKesson Affirm	396	1	396	25
1/10/2019	McKesson Affirm	397	1	397	25
1/10/2019	McKesson Affirm	398	1	398	25
1/10/2019	McKesson Affirm	399	1	399	25
1/10/2019	McKesson Affirm	400	1	400	25
1/10/2019	McKesson Affirm	401	1	401	25
1/10/2019	McKesson Affirm	402	1	402	25
1/10/2019	McKesson Affirm	403	1	403	25
1/10/2019	McKesson Affirm	404	1	404	25
1/10/2019	McKesson Affirm	405	1	405	25
1/10/2019	McKesson Affirm	406	1	406	25
1/10/2019	McKesson Affirm	407	1	407	25
1/10/2019	McKesson Affirm	408	1	408	25
1/10/2019	McKesson Affirm	409	1	409	25
1/10/2019	McKesson Affirm	410	1	410	11
1/10/2019	McKesson Resp	418	22	419	3
1/10/2019	McKesson Resp	428	14	428	19
1/10/2019	McKesson Resp	436	8	436	8

MCKESSON'S RESPONSES IN SUPPORT OF AFFIRMATIVE DESIGNATIONS FOR DONALD WALKER						
DEPO DATE	NOTES				PLAINTIFFS' OBJECTIONS	MCKESSON'S RESPONSES
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1/10/2019	360	4	360	15	Plaintiffs' Objection: Answer is Non-Responsive to Question Asked.	McKesson Response: Testimony is responsive to the question that was asked.
1/10/2019	360	16	360	25	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative.
1/10/2019	361	1	361	21	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative.
1/10/2019	362	16	362	25	Plaintiffs' Objection: Relevance; speculative.	McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.  Testimony is not speculative. Mr. Walker testified about his personal knowledge of the DEA's interactions with McKesson.
1/10/2019	363	1	363	8	Plaintiffs' Objection: Relevance; speculative.	McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.  Testimony is not speculative. Mr. Walker testified about his personal knowledge of the DEA's interactions with McKesson.
1/10/2019	364	16	364	25	Plaintiffs' Objection: Hearsay; violates judge's ruling on irrelevant, prejudicial testimony.	McKesson Response: Testimony is not hearsay because it is not offered to prove the content of any conversations that are described but rather the nature of the working relationship between McKesson and the DEA. The residual hearsay exception also applies.  Testimony is relevant and not prejudicial, and does not violate any court order. Testimony that is contrary to the plaintiffs' view of the facts is not prejudicial.
1/10/2019	365	1	365	11	Plaintiffs' Objection: Hearsay; violates judge's ruling on irrelevant, prejudicial testimony.	McKesson Response: Testimony is not hearsay because it is not offered to prove the content of any conversations that are described but rather the nature of the working relationship between McKesson and the DEA. The residual hearsay exception also applies.  Testimony is relevant and not prejudicial, and does not violate any court order. Testimony that is contrary to the plaintiffs' view of the facts is not prejudicial.
1/10/2019	366	1	366	10	Plaintiffs' Objection: Hearsay; violates judge's ruling on irrelevant, prejudicial testimony.	McKesson Response: Testimony is not hearsay because it is not offered to prove the content of any conversations that are described but rather to explain why Mr. Walker and McKesson first developed certain aspects of the Controlled Substance Monitoring Program—i.e., blocking orders. The residual hearsay exception also applies.  Testimony is relevant and not prejudicial, and does not violate any court order. Testimony that is contrary to the plaintiffs' view of the facts is not prejudicial.
1/10/2019	366	11	366	21	Plaintiffs' Objection: Leading.	McKesson Response: Questioning is not leading.

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1/10/2019	366	22	366	25	Plaintiffs' Objection: Relevance.	McKesson Response: The testimony is relevant to the DEA's policy on suspicious order reporting and McKesson's controlled substance monitoring programs, which is one of the central issues in this case. The Court expressly held that DEA's interpretation and enforcement of the suspicious order monitoring regulation are "material facts in dispute that must be resolved by a jury." See Order and Opinion Regarding Plaintiffs' Summary Judgment Motions Addressing the Controlled Substances Act [Dkt. #2483], at 28-29.
1/10/2019	367	1	367	15	Plaintiffs' Objection: Relevance.	McKesson Response: The testimony is relevant to the DEA's policy on suspicious order reporting and McKesson's controlled substance monitoring programs, which is one of the central issues in this case. The Court expressly held that DEA's interpretation and enforcement of the suspicious order monitoring regulation are "material facts in dispute that must be resolved by a jury." See Order and Opinion Regarding Plaintiffs' Summary Judgment Motions Addressing the Controlled Substances Act [Dkt. #2483], at 28-29.
1/10/2019	367	15	367	25	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.
1/10/2019	368	1	368	12	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.
1/10/2019	370	5	370	25	Plaintiffs' Objection: Relevance; Foundation.	McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.  Mr. Walker is noted as a recipient of the document at page 5. Mr. Walker testified extensively about his experience with the DEA, including his participation in the January 2006 meeting between McKesson and the DEA, which the document memorializes.
1/10/2019	371	1	371	7	Plaintiffs' Objection: Relevance; Foundation.	McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.  Mr. Walker is noted as a recipient of the document at page 5. Mr. Walker testified extensively about his experience with the DEA, including his participation in the January 2006 meeting between McKesson and the DEA, which the document memorializes.

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1/10/2019	372	1	372	22	Plaintiffs' Objection: Relevance; Foundation.	McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.  Mr. Walker is noted as a recipient of the document at page 5. Mr. Walker testified extensively about his experience with the DEA, including his participation in the January 2006 meeting between McKesson and the DEA, which the document memorializes.
1/10/2019	373	3	373	24	Plaintiffs' Objection: Improper Narrative; Non-Responsive to Question Asked.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.  Testimony is responsive to the question that was asked.
1/10/2019	374	1	374	25	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.
1/10/2019	375	1	375	10	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.
1/10/2019	375	11	375	19	Plaintiffs' Objection: Relevance.	McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.
1/10/2019	381	8	381	25	Plaintiffs' Objection: Vague; Improper Narrative.	McKesson Response: Questioning is not vague.  Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.
1/10/2019	382	1	382	8	Plaintiffs' Objection: Vague; Improper Narrative.	McKesson Response: Questioning is not vague.  Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.
1/10/2019	385	8	385	25	Plaintiffs' Objection: Relevance.	McKesson Response: Testimony is highly relevant to McKesson's controlled substance monitoring program and McKesson's suspicious order reporting to the DEA, which are central to this case. Testimony tends to prove that the DEA agreed that McKesson's suspicious order monitoring program under its Controlled Substance Monitoring Program (CSMP) complied with applicable regulations.
1/10/2019	390	14	390	17	Plaintiffs' Objection: Non-Responsive to Question Asked.	McKesson Response: Testimony is responsive to the question that was asked.
1/10/2019	392	18	392	25	Plaintiffs' Objection: Relevance; Improper Narrative.	McKesson Response: Testimony is highly relevant to McKesson's controlled substance monitoring program and McKesson's suspicious order reporting to the DEA, which are central to this case. Testimony tends to prove that the DEA agreed that McKesson's suspicious order monitoring program under its Controlled Substance Monitoring Program (CSMP) complied with applicable regulations.  Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.

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1/10/2019	393	1	393	8	Plaintiffs' Objection: Relevance; Improper Narrative.	McKesson Response: Testimony is highly relevant to McKesson's controlled substance monitoring program and McKesson's suspicious order reporting to the DEA, which are central to this case. Testimony tends to prove that the DEA agreed that McKesson's suspicious order monitoring program under its Controlled Substance Monitoring Program ("CSMP") complied with applicable regulations.  Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.
1/10/2019	393	18	393	25	Plaintiffs' Objection: Relevance.	McKesson Response: Testimony is highly relevant to McKesson's controlled substance monitoring program and McKesson's suspicious order reporting to the DEA, which are central to this case. Testimony tends to prove that the DEA agreed that McKesson's suspicious order monitoring program under its Controlled Substance Monitoring Program ("CSMP") complied with applicable regulations.
1/10/2019	394	1	394	10	Plaintiffs' Objection: Relevance.	McKesson Response: Testimony is highly relevant to McKesson's controlled substance monitoring program and McKesson's suspicious order reporting to the DEA, which are central to this case. Testimony tends to prove that the DEA agreed that McKesson's suspicious order monitoring program under its Controlled Substance Monitoring Program ("CSMP") complied with applicable regulations.
1/10/2019	394	24	394	25	Plaintiffs' Objection: Relevance.	McKesson Response: Testimony is highly relevant to McKesson's controlled substance monitoring program and McKesson's suspicious order reporting to the DEA, which are central to this case. Testimony tends to prove that the DEA agreed that McKesson's suspicious order monitoring program under its Controlled Substance Monitoring Program ("CSMP") complied with applicable regulations.
1/10/2019	395	1	395	5	Plaintiffs' Objection: Relevance.	McKesson Response: Testimony is highly relevant to McKesson's controlled substance monitoring program and McKesson's suspicious order reporting to the DEA, which are central to this case. Testimony tends to prove that the DEA agreed that McKesson's suspicious order monitoring program under its Controlled Substance Monitoring Program ("CSMP") complied with applicable regulations.
1/10/2019	397	13	397	25	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to proper questions.
1/10/2019	398	1	398	25	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to proper questions.
1/10/2019	399	1	399	25	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to proper questions.
1/10/2019	400	1	400	4	Plaintiffs' Objection: Improper Narrative.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to proper questions.
1/10/2019	401	2	401	25	Plaintiffs' Objection: Improper Narrative; Non-Responsive to Question Asked.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to proper questions.  Testimony is responsive to the questions that were asked.
1/10/2019	402	1	402	25	Plaintiffs' Objection: Improper Narrative; Non-responsive to question asked.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to proper questions.  Testimony is responsive to the questions that were asked.
1/10/2019	403	1	403	5	Plaintiffs' Objection: Improper Narrative; Non-responsive to question asked.	McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to proper questions.  Testimony is responsive to the questions that were asked.

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1/10/2019	403	9	403	25	Plaintiffs' Objection: Relevance; Speculation.	<p>McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.</p> <p>Testimony is not speculative. Mr. Walker testified about his personal knowledge of the DEA's interactions with McKesson.</p>
1/10/2019	404	1	404	1	Plaintiffs' Objection: Relevance; Speculation.	<p>McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.</p> <p>Testimony is not speculative. Mr. Walker testified about his personal knowledge of the DEA's interactions with McKesson.</p>
1/10/2019	404	2	404	23	Plaintiffs' Objection: Improper Narrative; Non-Responsive to Question Asked.	<p>McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.</p> <p>Testimony is responsive to the question that was asked.</p>
1/10/2019	405	4	405	6	Plaintiffs' Objection: Hearsay beginning with "The DRAs reported".	<p>McKesson Response: Testimony is not hearsay because it is not offered to prove the content of any conversations that are described but rather the nature of the working relationship between McKesson and the DEA. The residual hearsay exception also applies.</p>
1/10/2019	406	10	406	20	Plaintiffs' Objection: Improper Narrative; Non-Responsive to Question Asked.	<p>McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.</p> <p>Testimony is responsive to the question that was asked.</p>
1/10/2019	407	4	407	15	Plaintiffs' Objection: Improper Narrative; Non-responsive to question asked.	<p>McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.</p> <p>Testimony is responsive to the question that was asked.</p>
1/10/2019	408	1	408	19	Plaintiffs' Objection: Improper Narrative; Non-responsive to question asked; Relevance.	<p>McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.</p> <p>Testimony is responsive to the question that was asked.</p> <p>Testimony is highly relevant to McKesson's controlled substance monitoring program and McKesson's suspicious order reporting to the DEA, which are central to this case. Testimony tends to prove that the DEA agreed that McKesson's suspicious order monitoring program under its Controlled Substance Monitoring Program ("CSMP") complied with applicable regulations.</p>
1/10/2019	409	4	409	19	Plaintiffs' Objection: Improper Narrative; Non-responsive to question asked.	<p>McKesson Response: Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.</p> <p>Testimony is responsive to the question that was asked.</p>



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1/10/2019	409	20	409	25	Plaintiffs' Objection: Relevance; violates court's order on irrelevant and prejudicial testimony; improper narrative.	<p>McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.</p> <p>Testimony is relevant and not prejudicial, and does not violate any court order. Testimony that is contrary to the plaintiffs' view of the facts is not prejudicial.</p> <p>Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.</p>
1/10/2019	410	1	410	11	Plaintiffs' Objection: Improper narrative; relevance; violates court's order on irrelevant and prejudicial testimony.	<p>McKesson Response: Testimony is relevant to McKesson's interactions with the DEA and McKesson's controlled substance monitoring programs, which the plaintiffs have placed at issue in this case. The DEA's policy on suspicious order monitoring and reporting is central to this case, and McKesson's interactions with the DEA speak to the DEA's policy over time. Moreover, the DEA's actions with respect to controlled substances break any causal link between McKesson's actions and plaintiffs' alleged harms.</p> <p>Testimony is relevant and not prejudicial, and does not violate any court order. Testimony that is contrary to the plaintiffs' view of the facts is not prejudicial.</p> <p>Testimony is not narrative. Mr. Walker provided testimony in response to a proper question.</p>